

# EXHIBIT 15

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA**

STATE OF WASHINGTON,  
DEPARTMENT OF HEALTH,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

NO. 3:24-cv-05029

DECLARATION OF AMANDA  
SOLEIL MARIA MUÑIZ

I, AMANDA SOLEIL MARIA MUÑIZ, hereby declare the following:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge. My legal name is AMANDA SOLEIL MARIA MUÑIZ but I go by Soleil in my work.

2. I am the Federal Complaint Enforcement Lead for the state of Washington Department of Health (DOH or the Department) Office of the Assistant Secretary (OAS), which is part of DOH's Environmental Public Health Program, where I have worked since August 2023. I have a Master's Degree in International Policy Studies, Human Security and Development from the Middlebury Institute of International Studies at Monterey.

3. I work with others to implement House Bill 1470, which sets minimum standards for private detention facilities, and am the project manager that takes and investigates complaints or concerns from the public or any persons detained at a private detention facility in Washington

DECLARATION OF AMANDA SOLEIL  
MARIA MUÑIZ

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1 State. I assist in planning and implementing the complaint resolution team, determining  
 2 processes for complaints, assisting with rulemaking, seeking out opportunities for collaboration,  
 3 and carrying out investigations. I am part of the enforcement staff that DOH has hired for this  
 4 new project.

5 4. HB 1470 emphasizes transparency with complaint findings. This will eventually  
 6 include posting complaint data trends and inspection results on a DOH website accessible to the  
 7 public. HB 1470 has been codified as RCW 70.395. It requires the Department to conduct routine  
 8 unannounced inspections and to investigate complaints at private detention facilities; the Northwest  
 9 ICE Processing Center is such a facility operated by The Geo Group, Inc.

10 5. As part of my work to implement HB 1470 and RCW 70.395, I have received  
 11 complaints from detainees at the Northwest ICE Processing Center.

12 6. The complaint resolution team has received 277 complaints from detainees inside  
 13 the Northwest ICE Processing Center from April 2023 through the last week of December 2023.  
 14 The complaints are generally about lack of attention to medical needs, contaminated food,  
 15 insufficient food, dirty clothes and bedding, mistreatment of detainees, and hunger strikes.

16 7. Detainees have complained about lack of attention to medical needs. Medical  
 17 concerns reported include stroke, paralysis, heart conditions, internal bleeding, and asthma;  
 18 detainees say these complaints were not addressed by the GEO Group. One detainee asked to be  
 19 taken to the hospital, but was refused, another broke their arm and was given only Ibuprofen for  
 20 the pain and it took several days before the arm was placed in a cast.

21 8. Detainees have complained that the food provided to them has contained foreign  
 22 objects including burned plastic, metal string, rope, and splinters. The food is of low-quality and  
 23 is typically soy-based meat substitutes made into tacos or served over pasta. A detainee on a  
 24 medically-prescribed diet to include fruits and vegetables was refused such a diet. Detainees  
 25 report the food tastes bad, smells bad, makes their stomach hurt, and they do not receive enough  
 26 to eat.

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9. Detainees have complained they are unable to care for basic personal hygiene needs. They report their clothing, sheets, and blankets are rarely changed or laundered, and when laundered, are returned wet and dirtier than before. Clothing is not replaced; detainees have one change of clothes, and often that change of clothes has been previously worn by previous detainees and not washed in between. Sheets caused itching. A detainee with mental health issues had soiled their clothing but was refused clean clothing by one of the guards.

10. Detainees have complained the facility is unsanitary; bathrooms are rarely cleaned, and the toilets are often blocked, floors go unswept, and the facility smells like a dirty bathroom.

11. Detainees have also reported that solitary confinement is misused and they are being retaliated against by facility guards. A detainee was held in the medical unit in isolation for two weeks as punishment for failing to answer questions from the guards. Detainees have also reported guards retaliate against those who complain about conditions by making loud noises at night so that detainees cannot sleep.

12. Due to the above-mentioned allegations of health and safety violations from the people detained there I have visited the facility on four separate occasions, including attempts at entering in order to conduct investigations as the Department is required to do by RCW 70.395.

13. On November 14, 2023, I went with my supervisor Miko Nanto. We arrived at the front desk at 10:22 a.m. There was confusion at first as the front desk staff person thought we were the Tacoma-Pierce County Health Department and they started to process us to enter until Miko clarified we were with the Washington State Department of Health and not there as the health department for the kitchen. They were unaware of HB 1470 and did not seem to know anything about DOH coming to enter the facility based upon complaints.

14. The front desk staff person then called a few people and a person named Mr. Scott came down and asked who we were and what we needed. Miko spoke to him and let him know we were at the facility due to the passing of HB 1470 that allows DOH to conduct investigations

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1 and inspections regarding health and safety complaints. He then left. He came back and told us  
 2 that due to active litigation we were not allowed to enter. Miko politely asked him if he was  
 3 refusing entry and he agreed. We thanked him, and the front desk, and promptly left the building.  
 4 We left at 10:33 a.m.

5 15. The second attempted entry was November 27, 2023. Lauren Jenks, Miko Nanto,  
 6 and I all went to the Detention Center and arrived at 10:24 am. A different guard greeted us and  
 7 again mistook us for the Tacoma Pierce County Health Department, so Miko again clarified that  
 8 we were with the Washington State Department of Health and were there to investigate  
 9 complaints. Once again there seemed to be no knowledge of HB1470 and DOH investigating  
 10 complaints. We asked to speak with Mr. Scott. He came and we all introduced ourselves, Lauren  
 11 provided her business card. He asked what our visit was regarding, and Miko said to investigate  
 12 complaints and he asked what kind/type of complaints we received. Miko told him that laundry  
 13 services and health care were some of the topics. He then said they were not used to DOH coming  
 14 to their facility and I talked a little about the passing of HB 1470. He said these types of  
 15 inspections hadn't happened in previous years, and I explained that HB1470 was just recently  
 16 passed this year and he said he needed to go upstairs and speak with the ICE representatives.

17 16. He returned at 10:41 am and let us know we were being denied entry after  
 18 discussing with the ICE representatives due to the ongoing litigation. Lauren asked for his  
 19 business card, which he provided, and we thanked him and promptly left.

20 17. The third time I visited the facility, was on December 21, 2024. Miko Nanto and  
 21 I went to the NWIPC around 10 am to meet with Mr. Scott. He came down and met us while  
 22 Miko provided him with brochures we have created for anyone who would like to file a  
 23 complaint in both English and Spanish. Miko asked if we could drop them off with him. He  
 24 stated that he would give them to ICE. We also provided him with information on how to get  
 25 involved with our current rulemaking and let him know that both Geo Group and ICE could be  
 26 as involved as they would like.

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1           18.     Miko let him know for full transparency we had been receiving complaints from  
 2     an individual who is deaf and claiming that his ADA rights were not being adhered to, so we  
 3     have sent his complaints to the Office of Immigration Detention Ombudsman and Health and  
 4     Human Services Office of Civil Rights. We also mentioned that we were receiving complaints  
 5     regarding the women's pods not being able to receive clean undergarments and allegations they  
 6     were unclean or used. Miko also let him know we were not sure if he was aware of this and  
 7     wanted to make sure he knew. Miko did let him know we were only there for informational  
 8     purposes that day and not trying to enter the facility.

9           19.     We both thanked him for his time and left.

10          20.     The fourth visit was with my colleague Kaye Eckmann on January 16, 2024.

11          21.     I chatted and laughed with a guard outside as we were passing and getting ready  
 12     to enter the building. Kaye and I entered the facility at approximately 10:15 AM. I told the guard  
 13     at the desk that we were from the DOH and asked if Mr. Scott was there and available to talk.  
 14     The guard allowed Kaye to enter through the metal detector and into the lobby so that she could  
 15     use the restroom located there while he was on the phone locating Mr. Scott. The guard who had  
 16     been outside came in and took position behind the desk, so we continued chatting- mostly about  
 17     his ability to withstand the cold given that he was in his shirtsleeves even though it was freezing  
 18     outside. Once Kaye came out of the restroom, we both sat in the lobby area and waited.

19          22.     Mr. Scott came to the lobby area with a person named Jeff, who was the Assistant  
 20     Field Manager. I asked whether there was some kind of security clearance or background check  
 21     we needed to undergo in order to enter the facility. Jeff said there is a criminal check done by  
 22     GEO. Jeff said that when the time comes that we can go in, GEO will give us an email address  
 23     where we will be able to send basic biometrics information and they will run the criminal check,  
 24     which takes about two weeks. Kaye asked for clarification on how to submit the necessary  
 25     information for these background checks, and asked which email address we should send the  
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1 information to Jeff once again repeated that we would be given the email address once the time  
2 came when we would be allowed to enter.

3 23. I told Jeff and Mr. Scott there were complaints about the windows being painted  
4 over and not allowing natural light into the area where detainees are held. I thought Jeff looked  
5 confused when I mentioned the windows. I would characterize Mr. Scott as stoic during this  
6 conversation.

7 24. We left the facility at about 10:28. We were polite and respectful the entire time  
8 we were at the facility.

9 22. We have not been able to enter the facility to investigate the complaints about  
10 violations of RCW 70.395 we have received from detainees.

11 23. It is impossible for me to conduct thorough investigations, and do the job I was  
12 hired to do, if we are not allowed to enter. I am concerned for the health and safety of detainees  
13 as I believe there are violations of RCW 70.395 actively occurring.

14 I declare under the penalty of perjury under the laws of the United States and the State of  
15 Washington that the foregoing is true and correct.

16 SIGNED this 18th day of January 2024, at Tumwater, Washington.

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20 SOLEIL MUÑIZ  
21 Federal Complaint Enforcement Lead  
22 Washington State Department of Health  
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